

## **UK ETS Aviation Guidance Note**

### **Making a UK ETS Emissions Reduction Claim relating to the 2024 and 2025 Scheme Years**

#### **Introduction**

Under the Greenhouse Gas Emissions Trading Scheme Order 2020 (the UK ETS Order) sustainable aviation fuel derived from biomass that meets the sustainability criteria set out in Schedule 1 to the Renewable Transport Fuel Obligations Order 2007 (RTFO)<sup>1</sup> is treated as having an emissions factor of zero and is referred to in this Guidance Note as “Eligible SAF”.

The effect of the provisions in the UK ETS Order is to allow an Aircraft Operator to make an Emissions Reduction Claim as part of its Annual Emissions Report of aviation emissions to reflect the amount of Eligible SAF that it has purchased which has been delivered either to an aerodrome fuelling system or one of its aircraft. This Guidance Note sets out the Environment Agency’s approach to Emission Reduction Claims relating to the 2024 and 2025 Scheme Years. This follows the approach we have used for the 2022 and 2023 Scheme Years.

#### **Emissions Reduction Claim Requirements**

If you are an Aircraft Operator with compliance obligations in a Scheme Year and you are purchasing Eligible SAF, you may be able to reduce your aviation emissions figure and the corresponding number of allowances you are required to surrender, by making an Emissions Reduction Claim when you submit your Annual Emissions Report in the Manage your UK Emissions Trading Scheme reporting (METS) IT system.

Detailed information about completing your Emissions Reduction Claim in METS is set out in Schedule 1 of this document.

#### **What criteria must I meet to make an Emissions Reduction Claim?**

To make a successful Emissions Reduction Claim you must be able to demonstrate that all the following criteria have been met:

1. the amount of fuel you have purchased is Eligible SAF;
2. the purchase has taken place in the Scheme Year or in the three months prior to the start of the Scheme Year;
3. the Eligible SAF has been delivered to an aerodrome fuelling system or one of your aircraft before the 31 March reporting deadline for the Scheme Year;
4. there has been no double-counting of the Eligible SAF;
5. the Emissions Reduction Claim has been verified.

#### **How do I know that the fuel I have purchased is Eligible SAF?**

To be Eligible SAF, a fuel must:

1. be derived from biomass; and
2. meet the RTFO sustainability criteria in force at the date of purchase.

For the purpose of Emissions Reduction Claims relating to the 2024 and 2025 Scheme Years, a fuel that meets the Renewable Energy Directive 2018 (RED II) sustainability criteria will be

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<sup>1</sup> [Renewable Transport Fuel Obligation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/legislation/the-renewable-transport-fuel-obligation)

regarded as having met the RTFO sustainability criteria. Further details about suitable sustainability evidence can be found in the [Documentary evidence](#) section below.

Are there any geographical limits on the purchase and delivery of Eligible SAF?

No, you can make an Emissions Reduction Claim in relation to Eligible SAF purchased and delivered anywhere in the world.

When must the Eligible SAF purchase and delivery have taken place?

The Eligible SAF must have been:

1. purchased in the Scheme Year, or in the three months prior to the Scheme Year that your Emissions Reduction Claim relates to; and
2. delivered before the reporting deadline for the Scheme Year that your Emissions Reduction Claim relates to, namely 31 March in the year following that Scheme Year.

Proof of purchase and proof of delivery **must both** be submitted as supporting evidence in the Emissions Reduction Claim. Where Eligible SAF is delivered directly to an aircraft, including under a Mandate, the proof of delivery will also be regarded as sufficient evidence of purchase.

What is meant by delivered to an aerodrome fuelling system?

We regard a fuel as having been delivered to an aerodrome fuelling system if there is no prospect of it being diverted or removed from that system before the point of use in an aircraft, for example, delivery to a dedicated aviation fuel pipeline for an identifiable aerodrome or aerodromes.

Do I need to vary my Emissions Monitoring Plan before making an Emissions Reduction Claim?

Before you make an Emissions Reduction Claim, we expect you to have procedures relating to Emission Reduction Claims in your Emissions Monitoring Plan. Please contact the Environment Agency as soon as possible if you intend to make an Emissions Reduction Claim, so we can assist you to make the necessary amendments as detailed below.

You will need to submit an Emissions Monitoring Plan variation application in METS indicating that you intend to use Eligible SAF and provide details of the procedures you will put in place to:

- record the purchase of Eligible SAF;
- record the delivery of Eligible SAF to an aerodrome fuelling system or aircraft;
- demonstrate that the SAF included in your Emissions Reduction Claim meets the required sustainability criteria for Eligible SAF;
- ensure you avoid any double-counting of all or part of the Eligible SAF that could arise if you were to rely on it to claim a financial benefit in another regulatory scheme or sell it to another party.

Will my Emissions Reduction Claim need to be verified?

Yes, all Emissions Reduction Claims must be verified by a UK ETS UKAS accredited verifier.

If you currently instruct a verifier, they will need to verify your emissions from aviation activities in the usual way using standard fuel emissions factors. They will also verify the level of your Emissions Reduction Claim. The Emissions Reduction Claim will then be deducted from your emissions figure based on standard fuel emissions factors to provide a net verified aviation emissions figure, which will be the number of allowances you must surrender for the Scheme Year.

If you currently use simplified reporting procedures, you will need to engage a verifier and submit your Annual Emissions Report to them in METS for verification, so that they can verify your Emissions Reduction Claim and calculate your net verified aviation emissions figure for surrender purposes. If you have indicated that you will be making an Emissions Reduction Claim, then the METS report workflow will automatically require you to submit the completed Annual Emissions Report to your verifier for verification.

Your verifier will normally derive your net verified aviation emissions figure from your emissions figure based on simplified procedures and Eurocontrol Support Facility data less your Emissions Reduction Claim.

When considering your Emissions Reduction Claim, we expect your verifier to ensure that you have:

1. met the criteria set out in this Guidance Note when making your Emissions Reduction Claim.
2. complied with your issued or proposed Emissions Monitoring Plan procedures for Emissions Reduction Claims.
3. complied with the UK ETS Order (including the applicable requirements of the Monitoring and Reporting Regulation 2018, as amended by Schedule 4 of the UK ETS Order).
4. provided a clear audit trail for each tonne of Eligible SAF included in the Emissions Reduction Claim.

Further details about the verification process for an Emissions Reduction Claim in METS are provided in Schedule 3.

As an Emissions Reduction Claim provides a financial benefit by reducing the number of allowances an Aircraft Operator has to surrender, it is essential that all the criteria are met and fully supported by documentary evidence. We will only accept an Emissions Reduction Claim if you have provided all the documents to your verifier that are necessary to demonstrate the [criteria](#) have been met, and your verifier has verified the Emissions Reduction Claim on that basis. If your verifier cannot verify data submitted in support of part of your Emissions Reduction Claim, that part must be excluded. However, if the verifier identifies a calculation error in your Emissions Reduction Claim which can be corrected, then the verifier is permitted to enter a verified aviation emissions figure net of the Emissions Reduction Claim.

#### Are there any limits on the amount of Eligible SAF I can claim in relation to a Scheme Year?

Yes, the amount of Eligible SAF claimed must not exceed the total amount of fuel you used in relation to your UK ETS aviation activities in the Scheme Year; if you are using simplified reporting, you must not exceed the amount of fuel estimated using Eurocontrol Support Facility data. This means that you are not able to reduce your emissions figure below zero and there is no ability to apply an unused emissions reduction in relation to a future Scheme Year.

### What is meant by “double-counting”?

Under the UK ETS Order, you are required to provide evidence to the satisfaction of the regulator that there has been no double-counting of the same Eligible SAF. We consider this means that you must demonstrate to your verifier and us that no part of the Eligible SAF included in your Emissions Reduction Claim has been:

- (i) relied on **by you** to obtain an emissions reduction or a financial benefit in another scheme; or
- (ii) transferred for value to another person.

When you submit an Annual Emissions Report that includes an Emissions Reduction Claim, you must attach a signed copy of a “Declaration of no Double-Counting” on company headed paper using the text set out in Schedule 2 of this Guidance Note. When making this Declaration, please be aware that the UK ETS Order provides for a civil penalty where a person submits false or misleading information.

In addition, your verifier should not verify an Emissions Reduction Claim if it considers that this would result in any double-counting of the Eligible SAF.

### What units do I need to use when reporting the amount of Eligible SAF?

We require you to report the amount of Eligible SAF in tonnes. If you are converting from cubic metres (volume) to tonnes (mass), please ensure that you use the actual density figure at 15°C, for **each amount of Eligible SAF claimed for**. Provision of an actual density figure is important, particularly where supporting evidence is provided in units of volume, as your verifier will need this to audit the amount of SAF included in your claim.

It is not acceptable to use a standard aviation fuel density figure to calculate the mass of Eligible SAF. You will need to obtain the actual density figure from your SAF supplier (see Schedule 4) for each amount of Eligible SAF included in your Emissions Reduction Claim. Please do not use a density figure derived from aggregated actual density figures. Using the incorrect density figure may lead to an under-report and, possibly, a related under-surrender, which could result in a civil penalty.

### Can I use a different method to calculate the amount of my Eligible SAF?

Where fuel is delivered to your aircraft in physically identifiable amounts, it is possible under the UK ETS Order to use analyses approved by the regulator to determine the biomass element of a fuel comprised of fossil fuel and Eligible SAF, or to estimate the biomass fraction of the fuel on a mass balance of fossil fuels and biofuels purchased. If you are considering using one of these methods, please contact us so that we can discuss your proposed approach and any necessary approvals and the need for an Emissions Monitoring Plan variation.

### What documents do I need to support my Emissions Reduction Claim?

In order to make a successful Emissions Reduction Claim, you will need to provide evidence to demonstrate to the satisfaction of your verifier and us that all the criteria have been met, namely:

- the fuel in your Emissions Reduction Claim is Eligible SAF.

- you purchased the Eligible SAF within the Scheme Year, or three months prior to the start of the Scheme Year.
- the Eligible SAF was delivered to an aerodrome fuelling system, or to one of your aircraft before the 31 March reporting date for the Scheme Year.
- there has been no double-counting.

Please note the Emissions Reduction Claim **must** be based on documentary evidence; there is no role for estimation. Although we do not set out any prescriptive documentary requirements in relation to Emissions Reduction Claims, we have set out below examples of the documents we would expect you to provide. We have also provided a template with notes in Schedule 4, which includes a list of the information we recommend you obtain from your fuel supplier whenever you purchase fuel that you believe may qualify as Eligible SAF. This will make it easier for you to compile your Emissions Reduction Claim and provide supporting evidence to your verifier and to us.

#### Can I claim for Mandated SAF in my Emission Reduction Claim

We will accept Emission Reduction Claims for Eligible SAF supplied in line with a mandate (Mandated SAF) as long as all the [criteria](#) set out in this Guidance Note have been met e.g. the SAF meets the required sustainability criteria and has been purchased and delivered within the prescribed timescales. As with SAF that is not supplied under mandate, evidence must be provided for each amount included in your Emissions Reduction Claim.

#### Documentary Evidence Requirements

We have listed below the documents that you may submit in support of an Emissions Reduction Claim, but if you have any questions about the evidence you need to support your claim, please contact [etaviationhelp@environment-agency.gov.uk](mailto:etaviationhelp@environment-agency.gov.uk) to discuss.

Evidence must be provided for each amount of SAF included in the Emissions Reduction Claim. We have included a table in Schedule 4 listing the information we recommend you obtain for each eligible SAF amount claimed.

#### Documentary Evidence to show the sustainability criteria has been met

- copy of a Proof of Sustainability (PoS) certificate (or equivalent) or Product Transfer Document (PTD) which includes the ISCC EU or RSB EU RED batch certificate number;
- report from your fuel producer or supplier, containing specific batch-related information to demonstrate the SAF meets the sustainability criteria;
- proof of successful RTFO claim, e.g. RTFO Operating System screenshot - note this must show sufficient detail for each related amount of SAF you are claiming;
- documents or screenshot demonstrating that any Mandated SAF provided under a national mandate meets the sustainability criteria and, if required by your verifier or us, details about the terms of the national mandate.

A letter from your fuel supplier simply asserting compliance with the sustainability criteria or a SAF Mandate is not sufficient evidence for an Emissions Reduction Claim under UK ETS.

Documentary evidence of purchase/delivery

- PTD
- invoice
- delivery note
- fuel supplier report.

Note the evidence for purchase and delivery should detail the date of purchase on the document as well as the date of delivery. Where Eligible SAF is delivered directly to the aircraft, including under a Mandate, the proof of delivery will also be regarded as sufficient evidence of purchase.

## Schedule 1

### **Making an Emissions Reduction Claim in METS**

The following screenshots set out a step-by step guide to the Emissions Reduction Claim section of the Emissions Report Form in METS. You are required to attach all the supporting evidence in relation to sustainability criteria, purchase and delivery, and to provide a declaration of no double-counting in this section of the report workflow in order to submit the completed form.

**Step 1:** Navigate to and click on the 'Emissions Reduction Claim' section on the Emissions Report summary page.

### Complete 2023 emissions report

Assigned to: Aircraft Operator

Days Remaining: 86

**Related actions**

[Reassign task](#)

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**Reporting obligation**

<a href="#">Reporting obligation</a>	<b>COMPLETED</b>
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**Identification**

<a href="#">Service contact details</a>	<b>IN PROGRESS</b>
<a href="#">Operator details</a>	<b>IN PROGRESS</b>

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**Emissions overview**

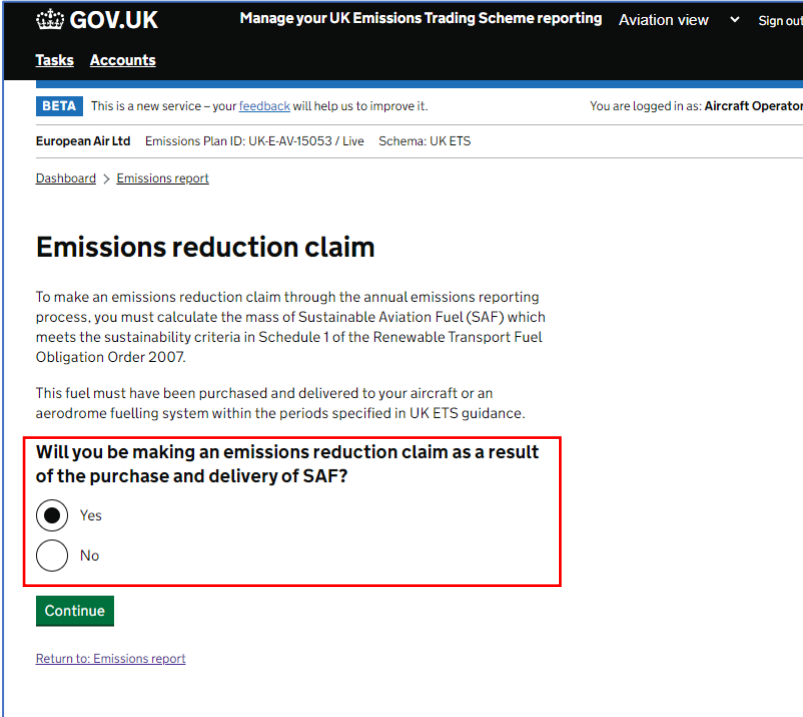
<a href="#">Monitoring plan changes</a>	<b>NOT STARTED</b>
<a href="#">Monitoring approach</a>	<b>NOT STARTED</b>
<a href="#">Aggregated consumption and flight data</a>	<b>NOT STARTED</b>
<a href="#">Aircraft types data</a>	<b>NOT STARTED</b>
<a href="#">Emissions reduction claim</a>	<b>IN PROGRESS</b>

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**Additional information**

<a href="#">Additional documents and information</a>	<b>NOT STARTED</b>
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**Step 2:** Answer 'Yes' to the question 'Will you be making an Emissions Reduction Claim as a result of the purchase and delivery of SAF?'



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**Tasks Accounts**

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European Air Ltd Emissions Plan ID: UK-E-AV-15053 / Live Schema: UK ETS

[Dashboard](#) > [Emissions report](#)

### Emissions reduction claim

To make an emissions reduction claim through the annual emissions reporting process, you must calculate the mass of Sustainable Aviation Fuel (SAF) which meets the sustainability criteria in Schedule 1 of the Renewable Transport Fuel Obligation Order 2007.

This fuel must have been purchased and delivered to your aircraft or an aerodrome fuelling system within the periods specified in UK ETS guidance.

**Will you be making an emissions reduction claim as a result of the purchase and delivery of SAF?**

Yes

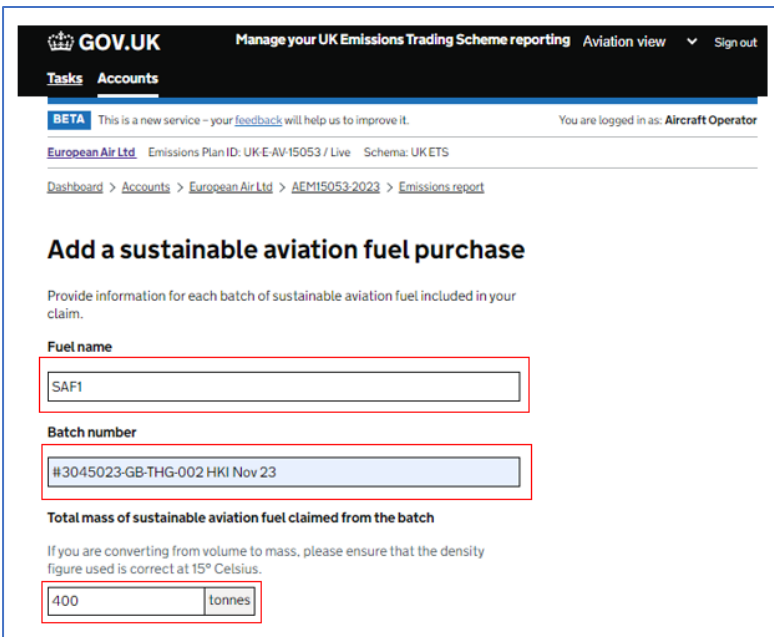
No

**Continue**

[Return to: Emissions report](#)

**Step 3:** For each amount of Eligible SAF being claimed provide details of the:

- Fuel name
- Proof of Sustainability Batch certificate number(s)
- Mass of the amount of SAF being claimed. Note if you are converting volume to mass, you must use the specific density of the Eligible SAF at 15°C.



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[Dashboard](#) > [Accounts](#) > [European Air Ltd](#) > [AEM15053-2023](#) > [Emissions report](#)

### Add a sustainable aviation fuel purchase

Provide information for each batch of sustainable aviation fuel included in your claim.

**Fuel name**

SAF1

**Batch number**

#3045023-GB-THG-002 HKI Nov 23

**Total mass of sustainable aviation fuel claimed from the batch**

If you are converting from volume to mass, please ensure that the density figure used is correct at 15° Celsius.

400 tonnes

Additionally, for each amount of Eligible SAF you will need to upload evidence that it:

- meets the sustainability criteria; and
- was purchased and delivered within the timescales set out in this Guidance Note.

You will first need to indicate what type of evidence you are providing to prove the sustainability criteria is met. You can upload multiple files to this section. Note if your supporting evidence only details the amount of Eligible SAF in volume you will need to provide the actual density figure you have used to convert to mass.

**What evidence do you have that proves this batch meets the sustainability criteria set out in the UK ETS Order?**

Screenshot from the RTFO registry

Voluntary certification scheme marking (for example, ISCC)

Fuel supplier report

or

Other evidence

**Upload evidence of proof of sustainability, and proof of purchase and delivery**

The batch must be:

- purchased in the scheme year, or up to three months beforehand
- delivered no later than 31 March of the year after the scheme year

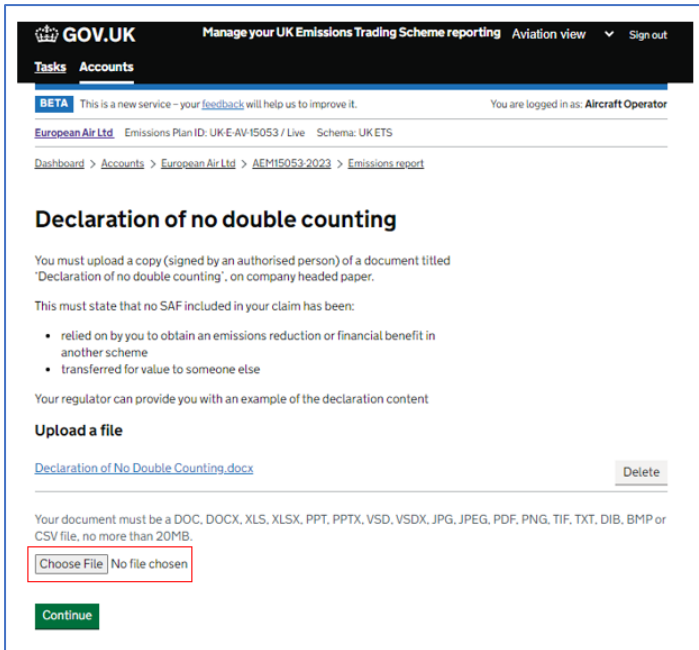
Your document must be a DOC, DOCX, XLS, XLSX, PPT, PPTX, VSD, VSDX, JPG, JPEG, PDF, PNG, TIF, TXT, DIB, BMP or CSV file, no more than 20MB.

Drag and drop files here or

[Return to: Emissions report](#)

Note you will not be able to complete this step unless you upload the appropriate evidence.

**Step 4:** Complete the Declaration of no Double-Counting set out in Schedule 2 of this Guidance Note and upload to the following section, by clicking on 'Choose File'. The Declaration must be on company headed paper and signed by an individual who has the appropriate authority to do so on behalf of the Aircraft Operator.



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[European Air Ltd](#) Emissions Plan ID: UK-E-AV-15053 / Live Schema: UK ETS

Dashboard > Accounts > European Air Ltd > AEM15053-2023 > Emissions report

### Declaration of no double counting

You must upload a copy (signed by an authorised person) of a document titled 'Declaration of no double counting', on company headed paper.

This must state that no SAF included in your claim has been:

- relied on by you to obtain an emissions reduction or financial benefit in another scheme
- transferred for value to someone else

Your regulator can provide you with an example of the declaration content

**Upload a file**

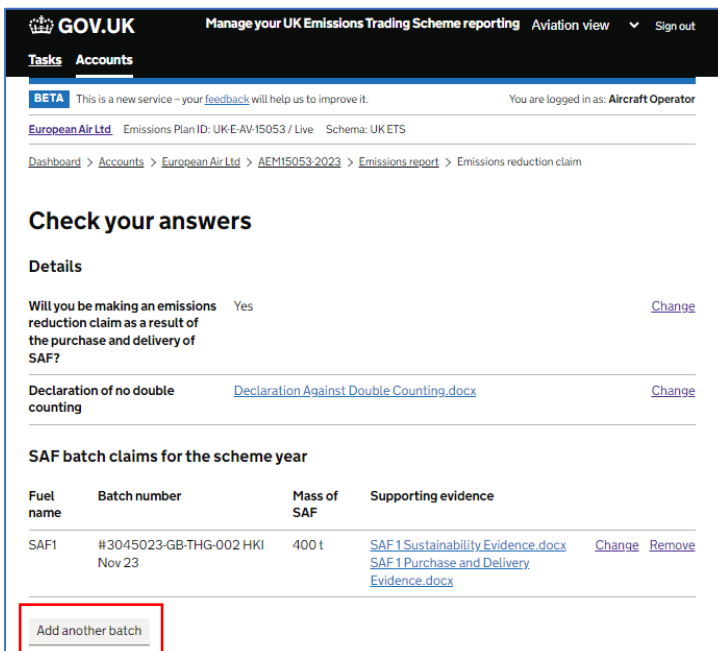
[Declaration of No Double Counting.docx](#) [Delete](#)

Your document must be a DOC, DOCX, XLS, XLSX, PPT, PPTX, VSD, VSDX, JPG, JPEG, PDF, PNG, TIF, TXT, DIB, BMP or CSV file, no more than 20MB.

[Choose File](#) No file chosen

[Continue](#)

**Step 5:** Once you have completed the Declaration, click on continue which will take you to a summary page. To add further Eligible SAF amounts click on 'Add another batch' and repeat Step 3.



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[European Air Ltd](#) Emissions Plan ID: UK-E-AV-15053 / Live Schema: UK ETS

Dashboard > Accounts > European Air Ltd > AEM15053-2023 > Emissions report > Emissions reduction claim

### Check your answers

**Details**

Will you be making an emissions reduction claim as a result of the purchase and delivery of SAF? **Yes** [Change](#)

Declaration of no double counting [Declaration Against Double Counting.docx](#) [Change](#)

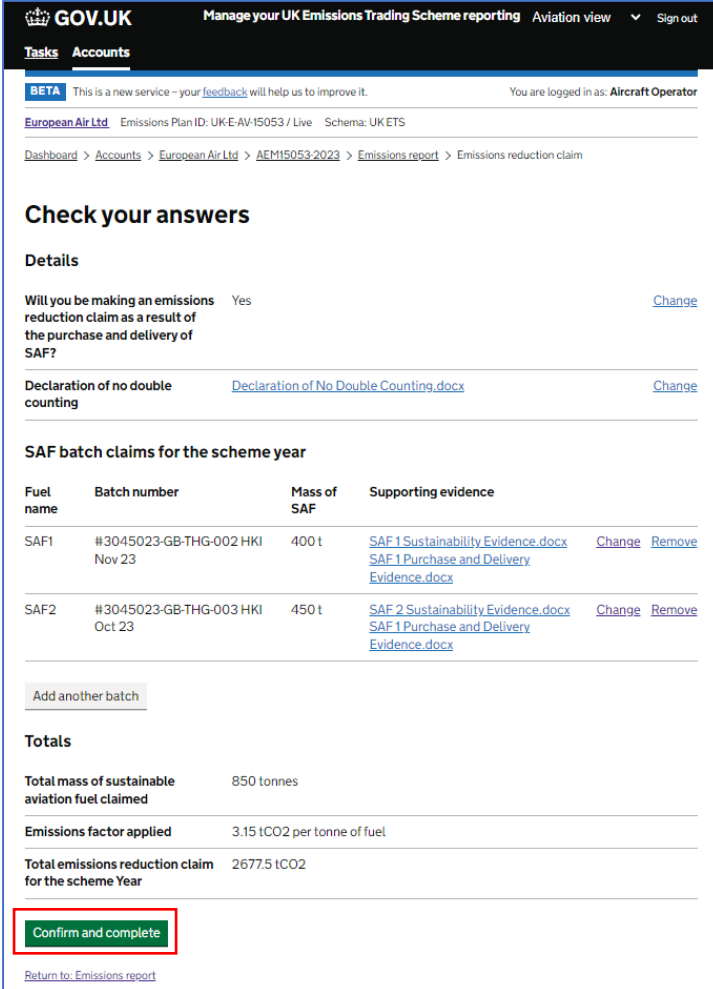
**SAF batch claims for the scheme year**

Fuel name	Batch number	Mass of SAF	Supporting evidence
SAF1	#3045023-GB-THG-002 HKI Nov 23	400 t	<a href="#">SAF 1 Sustainability Evidence.docx</a> <a href="#">Change</a> <a href="#">Remove</a> <a href="#">SAF 1 Purchase and Delivery Evidence.docx</a>

[Add another batch](#)

Note **each amount of Eligible SAF you have purchased which is being claimed for** must be detailed in a separate entry in the form, and the appropriate evidence uploaded. Multiple amounts must not be aggregated together in the same entry.

**Step 6:** Review your answers for the Emissions Reduction Claim section. If you need to amend any details, click on the ‘Change’ link for the appropriate section. Once you are satisfied, click on the ‘Confirm and complete’ button to complete the Emissions Reduction Claim section.



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European Air Ltd Emissions Plan ID: UK-E-AV-15053 / Live Schema: UK ETS

Dashboard > Accounts > European Air Ltd > AEM15053-2023 > Emissions report > Emissions reduction claim

## Check your answers

### Details

Will you be making an emissions reduction claim as a result of the purchase and delivery of SAF? Yes [Change](#)

Declaration of no double counting [Declaration of No Double Counting.docx](#) [Change](#)

### SAF batch claims for the scheme year

Fuel name	Batch number	Mass of SAF	Supporting evidence
SAF1	#3045023-GB-THG-002 HKI Nov 23	400 t	<a href="#">SAF 1 Sustainability Evidence.docx</a> <a href="#">Change</a> <a href="#">Remove</a> <a href="#">SAF 1 Purchase and Delivery Evidence.docx</a>
SAF2	#3045023-GB-THG-003 HKI Oct 23	450 t	<a href="#">SAF 2 Sustainability Evidence.docx</a> <a href="#">Change</a> <a href="#">Remove</a> <a href="#">SAF 1 Purchase and Delivery Evidence.docx</a>

[Add another batch](#)

### Totals

Total mass of sustainable aviation fuel claimed	850 tonnes
Emissions factor applied	3.15 tCO <sub>2</sub> per tonne of fuel
Total emissions reduction claim for the scheme Year	2677.5 tCO <sub>2</sub>

**Confirm and complete**

[Return to: Emissions report](#)

### Note for those using Simplified Reporting Procedures

If you have stated in the ‘Monitoring Approach’ section of the report workflow that you have used simplified reporting procedures and you have indicated that you will be making an Emissions Reduction Claim, the METS report workflow will automatically require you to submit the completed Emissions Report to a verifier for verification.

[Dashboard](#) > [Emissions report](#)

## Send report for verification

### Current verifier

UK ETS Approved Verifier Ltd

By selecting 'Confirm and send' you confirm that the information in your report is correct to the best of your knowledge.

[Confirm and send](#)

[Return to: Emissions report](#)

On submission of your Emissions Report Form, you will be provided with the functionality to send your report to your verifier. On completion of the verification, your verifier will submit your Emissions Report and their verification report back to you, at which point you will be able to submit them to us.

## Schedule 2

### **Declaration of no Double-Counting (on company headed paper)**

#### **Greenhouse Gas Emissions Trading Scheme Order 2020** **Declaration of no Double-Counting**

**Aircraft Operator: {AO Name}**  
**CRCO number: {Insert CRCO Number}**

*On behalf of the Aircraft Operator, I confirm that none of the Sustainable Aviation Fuel (SAF) included in its UK ETS Emissions Reduction Claim relating to the 202[ ] Scheme Year has been sold or used by the Aircraft Operator to claim an emissions reduction or financial benefit in any other scheme.*

*I confirm that I am authorised to make this Declaration on behalf of the Aircraft Operator.*

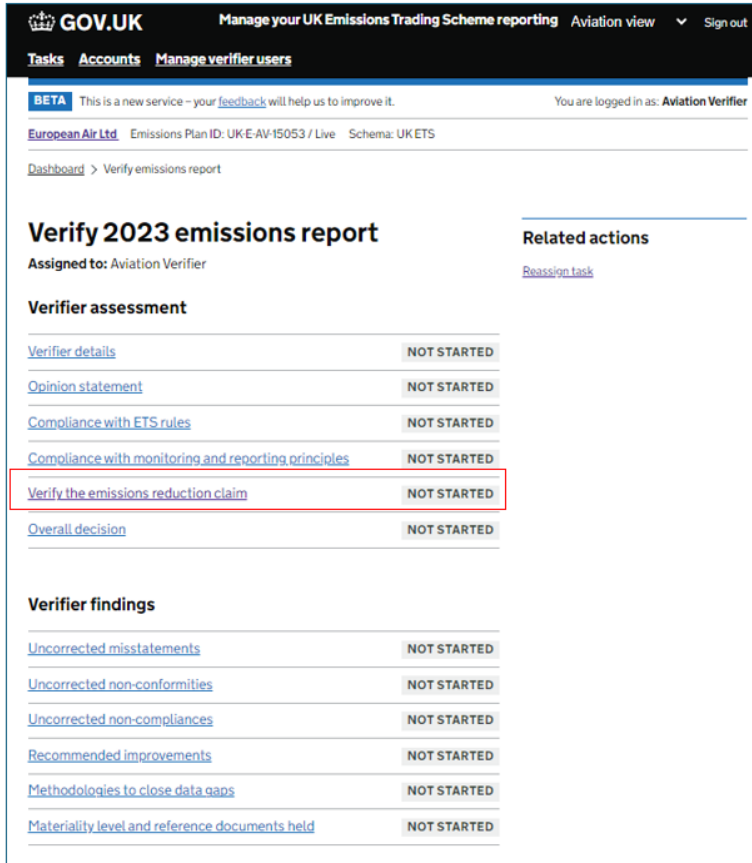
Name:  
Position in Aircraft Operator:  
Date:

## Schedule 3 – Information for Verifiers

### Verification of an Emissions Reduction Claim

The following are screen shots taken from the verification workflow for an Emission Report in METS, which show the sequence of questions that need to be answered by the verifier in order to verify an Emissions Reduction Claim.

**Step 1:** Navigate to and click on the ‘Emissions Reduction Claim’ section in the Verifier assessment.



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European Air Ltd Emissions Plan ID: UK-E-AV-15053 / Live Schema: UK ETS

Dashboard > Verify emissions report

### Verify 2023 emissions report

Assigned to: Aviation Verifier [Reassign task](#)

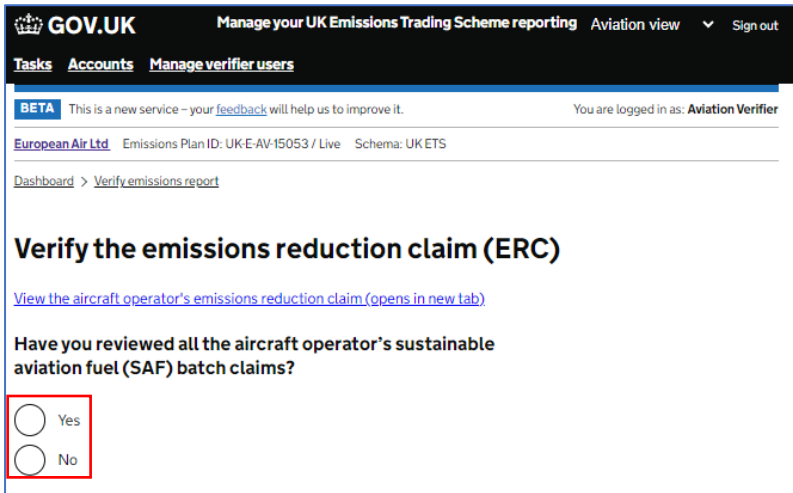
#### Verifier assessment

<a href="#">Verifier details</a>	NOT STARTED
<a href="#">Opinion statement</a>	NOT STARTED
<a href="#">Compliance with ETS rules</a>	NOT STARTED
<a href="#">Compliance with monitoring and reporting principles</a>	NOT STARTED
<a href="#">Verify the emissions reduction claim</a>	NOT STARTED
<a href="#">Overall decision</a>	NOT STARTED

#### Verifier findings

<a href="#">Uncorrected misstatements</a>	NOT STARTED
<a href="#">Uncorrected non-conformities</a>	NOT STARTED
<a href="#">Uncorrected non-compliances</a>	NOT STARTED
<a href="#">Recommended improvements</a>	NOT STARTED
<a href="#">Methodologies to close data gaps</a>	NOT STARTED
<a href="#">Materiality level and reference documents held</a>	NOT STARTED

**Step 2:** Indicate by selecting ‘Yes’ or ‘No’ if you audited all the amount of SAF being claimed.



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European Air Ltd Emissions Plan ID: UK-E-AV-15053 / Live Schema: UK ETS

Dashboard > Verify emissions report

### Verify the emissions reduction claim (ERC)

[View the aircraft operator's emissions reduction claim \(opens in new tab\)](#)

Have you reviewed all the aircraft operator's sustainable aviation fuel (SAF) batch claims?

Yes

No

If you select 'No' you will be asked to detail which amounts of SAF have been omitted from the audit. You will also be asked to detail the data sampling that has been carried out and the documents that were reviewed, in order to show the Emissions Reduction Claim has been sufficiently audited.

**Have you reviewed all the aircraft operator's sustainable aviation fuel (SAF) batch claims?**

Yes

No

List the batch references that were not reviewed

Describe how data sampling was carried out and what documents you reviewed

**Step 3:** Provide detail of the outcome of the review of the amounts of SAF which have been audited, detailing whether you believe the evidence provided meets the requirements of this Guidance Note and that the actual amount of SAF detailed is accurate; in particular, you should be satisfied that where the amount of SAF has been converted from volume to mass this has been done using the appropriate density figure.

**Describe the results of your review**

You should state if:

- the ERC is supported by sufficient and appropriate internal and external evidence
- the amount of reductions from the use of eligible SAF is fair and accurate

You can report any misstatements in the verifier findings section.

**Step 4:** Check that a signed Declaration of no Double Counting has been provided by the Aircraft Operator. You will need to confirm that no double counting has taken place. In order to do so, you will need to check if the Aircraft Operator has obligations under any other greenhouse gas emissions reduction schemes and, if so, whether they have made any SAF claims as part of their reporting under those schemes.

### Confirmation of no double-counting

Describe the steps you took to confirm none of the SAF included in the ERC relating to the scheme year had been sold or used elsewhere by the aircraft operator to claim an emissions reduction, or financial benefit, in any other mandatory or voluntary scheme

**Step 5:** You are required to indicate by answering 'Yes' or 'No' if all the necessary evidence has been provided for all the amounts of SAF being claimed. This includes the necessary sustainability evidence and purchase and delivery documentation. Note: if you select 'No', you will be required to qualify what issues you have identified in an additional field.

### Do all of the batch claims reviewed contain evidence that shows the sustainability, purchase and delivery criteria were met?

Valid batch claims must:

- meet the RTFO Schedule 1 sustainability criteria
- be purchased in the scheme year, or up to three months beforehand
- be delivered no later than 31 March of the year after the scheme year

Yes

No

**Step 6:** Indicate by answering 'Yes' or 'No' if the Emissions Reduction Scheme meets the requirements of the Aircraft Operator's procedures in their Emissions Monitoring Plan, the legislation and the guidance.

### Was the aircraft operator's ERC compliant with their emissions monitoring plan, the legislation and regulator guidance?

This includes the requirements to ensure there has been no double-counting.

Yes

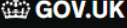
No

[Continue](#)

[Return to: Verify emissions report](#)

Answering 'No' will require additional explanation. Once you have completed this section click on 'Continue' to take you to the summary page.

**Step 7:** Review your answers, and if you need to amend any section click on the 'Change' next to the corresponding information. Once you are satisfied click on the 'Confirm and complete' button.

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[European Air Ltd](#) Emissions Plan ID: UK-E-AV-15053 / Live Schema: UKETS

[Dashboard](#) > [Verify emissions report](#) > Verify the emissions reduction claim (ERC)

## Check your answers

### Details

<b>Have you reviewed all the aircraft operator's sustainable aviation fuel (SAF) batch claims?</b>	Yes	<a href="#">Change</a>
<b>Results of your review</b>	All SAF included in the ERC has audited with amount of SAF traced back to the purchase and delivery evidence. Although the amounts of SAF in the documentation are detailed in volume fuel density values for each amount of SAF has been provided. The total mass of SAF claimed is an accurate reflection of SAF included in the supporting documentation.	<a href="#">Change</a>
<b>Confirmation of no double-counting</b>	The aircraft operator had no obligations under EU ETS or CORSIA for the scheme year, and has not sold any of the eligible SAF being claimed to a third party.	<a href="#">Change</a>
<b>Do all of the batch claims reviewed contain evidence that shows the sustainability, purchase and delivery criteria were met?</b>	Yes	<a href="#">Change</a>
<b>Compliance with UK ETS requirements</b>	Yes	<a href="#">Change</a>

Confirm and complete

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## Schedule 4

### Table of Information we recommend you obtain for each eligible SAF amount

Information	Explanatory Notes
Name of customer	<i>this should be the Aircraft Operator making the emissions reduction claim</i>
Date of purchase	<i>date of purchase by the Aircraft Operator making the emissions reduction claim</i>
Terms of delivery	<i>e.g. into plane delivery</i>
Location of delivery	<i>the aerodrome and country/State in which the delivery was made</i>
Date of delivery	<i>date of delivery of the Eligible SAF to an aerodrome fuelling system or the Aircraft Operator's aircraft</i>
Sustainability Certification Scheme	<i>certification scheme relevant to the Eligible SAF e.g. ISCC EU</i>
Sustainability batch certificate number	<i>sustainability certificate number of the batch of the Eligible SAF from which the purchase/delivery has been made i.e. POS number or certificate of equivalent evidential value</i>
Fuel supplier	<i>name of the supplier of the Eligible SAF to the Aircraft Operator</i>
Producer of the Eligible SAF	<i>name of the Eligible SAF producer</i>
Certificate Number of producer	<i>Producer accreditation details relating to eligible SAF e.g. ISCC Certificate Number</i>
Volume and density, or mass of the Eligible SAF purchased and delivered	<i>the volume of Eligible SAF purchased and delivered, in cubic metres or litres</i>
Type of biocomponent	<i>e.g. HCC, HEFA</i>
Eligible SAF GHG total	<i>GHG TOTAL gCO<sub>2</sub> eq/MJ</i>
GHG saving (%)	<i>Saving %</i>
Feedstock type	<i>e.g. Animal Fat</i>
Origin of feedstock	<i>State/Country</i>

## **Schedule 5**

### **Glossary of Terms/Links**

- Aviation Activity – a flight regulated under the UK ETS, as defined in Schedule 1 of the UK ETS Order - [The Greenhouse Gas Emissions Trading Scheme Order 2020 \(legislation.gov.uk\)](https://legislation.gov.uk)
- Amount of SAF claimed – each entry in the Emissions Reduction Claim form in METS which is an amount of fuel or material representatively sampled and characterised, and transferred as one shipment or continuously over a specific period
- Batch – a quantity of SAF which has been certified under a sustainability certification scheme and detailed in a batch certificate from that scheme
- Eligible SAF - sustainable aviation fuel derived from biomass that meets the sustainability criteria referred to in Schedule 1 to the Renewable Transport Fuel Obligations Order 2007 (RTFO) (treated as having an emissions factor of zero in UK ETS); for the 2024 and 2025 Scheme Years this will include a fuel that meets the requirements of RED II
- ERC – Emissions Reduction Claim
- Mandated SAF – SAF supplied in line with the requirements of a Mandate set by a State.
- PTD – Product Transfer Document.
- RED II - Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources - [EUR-Lex - 02018L2001-20220607 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/lexuris/ui/02018L2001-20220607-EN).
- RTFO - Renewable Transport Fuel Obligations Order 2007 - [The Renewable Transport Fuel Obligations Order 2007 \(legislation.gov.uk\)](https://legislation.gov.uk).
- UK ETS – UK Emissions Trading Scheme.
- UK ETS Order - the Greenhouse Gas Emissions Trading Scheme Order 2020 - [The Greenhouse Gas Emissions Trading Scheme Order 2020 \(legislation.gov.uk\)](https://legislation.gov.uk).